

TRINET GROUP, INC. and TRINET
USA, INC.

V.

Defendant.

CIVIL ACTION NO. 5:19-cv-00055-FB

The parties recommend that the following deadlines be entered in the scheduling order to control the course of this case:

- ## SCHEDULING RECOMMENDATIONS

by FED. R. CIV. P. 26(a)(2)(B) by June 16, 2019. Parties resisting claims for relief shall file their designation of testifying experts and shall serve on all parties, but not file the materials required by FED. R. CIV. P. 26(a)(2)(B) by July 1, 2019. All designations of rebuttal experts shall be designated within 14 days of receipt of the report of the opposing expert.

5. An objection to the reliability of an expert's proposed testimony under Federal Rule of Evidence 702 shall be made by motion, specifically stating the basis for the objection and identifying the objectionable testimony, within 30 days of receipt of the written report of the expert's proposed testimony, or within 30 days of the expert's deposition, if a deposition is taken, whichever is later.

6. The parties shall complete all discovery on or before December 31, 2019. Counsel may by agreement continue discovery beyond the deadline, but there will be no intervention by the Court except in extraordinary circumstances, and no trial setting will be vacated because of information obtained in post-deadline discovery.

7. All dispositive motions shall be filed no later than January 31, 2020. Dispositive motions as defined in Local Rule CV-7(c) and responses to dispositive motions shall be limited to 20 pages in length.

8. The trial date will be determined at a later date by the Court. The parties shall consult Local Rule CV-16(e)-(g) regarding matters to be filed in

advance of trial. At the time the trial date is set, the Court will also set the deadline for the filing of matters in advance of trial.

9. All of the parties who have appeared in the action conferred concerning the contents of the proposed scheduling order on February 22, 2019 and the parties have agreed as to its contents.

DATED: March 15, 2019

Respectfully submitted,

/s/ Gerald E. Hawxhurst

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DATED: March 14, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

When All Case Participants are Registered for the CM/ECF System

U.S. District Court Docket Number: 5:19-cv-00055-FB

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system on March 15, 2019.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

DATED: March 15, 2019

HAWXHURST HARRIS LLP

By s/ Gerald E. Hawxhurst

Gerald E. Hawxhurst

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